

**Autumnwood ESH Consultants**

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21 May 2018

Mr. John Nordine  
U.S. EPA Region 5  
RCRA Enforcement and Compliance Assurance Branch (LU-16)  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois RCRA CMI Monthly Progress Report - March 2018,  
Rev. 1  
EPA ID: ILD005178975

Dear Mr. Nordine:

Enclosed please find the revised RCRA CMI Monthly Progress Report for the Central Wire, Inc. (CWI) facility in Union, Illinois for March 2018, incorporating your concerns.

This report includes the eDMR for the groundwater pump & treat facility and the NPDES laboratory analytical reports, which include the effluent data used in the eDMR. It also includes the Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) well data (sampled quarterly) for Volatile Organic Compounds which are included in the 3-2018 NPDES Analytical Report file.

If you have any comments or questions regarding the progress of this project, please contact me at (262) 237-1130.

Sincerely,

**Autumnwood ESH Consultants, LLC**

John W. Thorsen, P.E.

JWT: jt

encl

cc:	Joyce Munie	IEPA
	Robert Kay	USGS
	Gerald W. Ruopp	Central Wire
	Robert Johnson	Central Wire

**MONTHLY PROGRESS REPORT**  
**Central Wire Union, Illinois Site**  
**March 2018**

- 1 Progress Made This Reporting Period** – In this reporting period Central Wire Inc. (CWI) continued the operation and maintenance of the groundwater extraction and treatment (P&T) system. CWI treated an average of 404,000 gallons per day (GPD) with a maximum daily flow of 419,000 GPD. Table 1, attached, lists the average daily P&T volumes by month from January 2015 through March 2018.

EPA noted that the volume of groundwater extracted for Extraction Well No. 2 continues to decline at rate of approximately 30,000 gallons per day or about 21 gallons per hour. CWI has contacted Country Well & Pump, Inc. (Garden Prairie, IL) to provide suggestions on how to increase the production at that well. CWI is awaiting their response.

The monthly NPDES sample met effluent limitations for pH, 1,1,1-Trichloroethane (TCA), Trichloroethene (TCE) and Tetrachloroethene (PCE). The electronic Discharge Monitoring Report (eDMR) for the month is attached to this report.

The laboratory analytical report for the pump and treat effluent sample and the **Ex. 6 Personal Privacy (PP)** sample were collected on March 14, 2018 and arrived at Test America Laboratory on March 15, 2018 at 3.2° C. There were no volatile organic compound detections found in the **Ex. 6 Personal Privacy (PP)** sample.

**2 Summary of Validated Data and Results**

**Pump & Treat System Monthly NPDES Samples**

The permit limitations and analytical results are shown in Table 2, below. There were no effluent limitation exceedances.

**Table 2**  
**Central Wire Union Illinois Pump & Treat Discharge Analytical Results**

Parameter	Effluent Limitation (Daily Maximum), µg/L	Analytical Results, µg/L
1,1,1-Trichloroethane	20	< 0.38
Tetrachloroethene	20	0.69 J
Trichloroethene	20	0.79

J = Result is < the Reporting Limit but >= to the Method Detection Limit and the concentration is an approximate value.

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## **Ex. 6 Personal Privacy (PP) Sample**

Central Wire collected a sample at the **Ex. 6 Personal Privacy (PP)** on March 14, 2018. This well is being used to supply water to the toilet in the office. See Figure 1 for location of this well. There were no detections of volatile organic compounds. These results are in the attached analytical report.

### **CWI Quarterly Extraction Well Samples**

These samples are collected quarterly in the third month of the calendar quarter. Samples were collected in March and the results are provided in Table 3, revised and attached, which shows the quarterly data back to the first quarter of 2014.

EPA has requested that CWI provide information on EPA Maximum Contaminant Limits (MCL) exceedances, trends in concentration of major contaminants through time, potential effects of decreased pumping in EW-2 on results (TCE, PCE, TCA, trends appear to mirror pumping trends) and the implications for plume capture.

Regarding MCL exceedances for Extraction Well No. 1 (EW-1), the TCE has exceeded the MCL on each sample collected since the first quarter of 2014 (1Q2014). The levels have decreased from a high of 15 µg/L in 2Q2014 to the current low value of 6.5 µg/L in 1Q2018. PCE has exceeded the MCL only once in EW-1 in 2Q2014 and, except for the 1Q2014 and 4Q2015 where it was recorded at 1 µg/L, all other values have been < 1 µg/L. For TCA, there have been no MCL exceedances and the values have ranged from 0.2 to 18 µg/L, well below the MCL of 200 µg/L, though recent samples have been in the 3.4 to 4.4 µg/L range. For DCE, 10 of the 12 samples since 2Q2015 have exceeded the MCL, ranging 7.0 to 9.4 µg/L with no apparent trend. For cis-1,2-DCE, for 17 samples, the MCL was exceeded 13 times, include the last 12 quarters with exceedance values ranging from 70 to 110 µg/L, with no apparent trend.

For Extraction Well No. 2 (EW-2), TCE has exceeded the MCL in each of the 17 samples. Values range from 6.8 to 23 µg/L with no apparent trend, though the high of 23 µg/L was observed in 2Q2014 and the last three quarters have averaged 9 µg/L. For PCE the values range from anomalies of 0 and 1.7 µg/L to in the upper 20s and 30s in µg/L with a slight downward trend from 38 µg/L in 2Q2014 to 26 µg/L in 1Q2018. TCA values in EW-2 were all below the MCL and ranged from 2.9 to 32 µg/L. For DCE, all values but 3Q2017 were below the MCL of 7 µg/L. The 3Q2017 slightly exceeded the MCL at 9.1 µg/L. There were no issues with cis-1,2-DCE in EW-2.

Regarding potential effects of decreased pumping in EW-2, there does not appear to be a trend associated with the decreased production from EW-2.

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The decreased production in EW-2 does have implications for reduced plume capture, but at this time CWI is focusing on increasing production in EW-2 as opposed to evaluating the capture zone.

This March 2018 NPDES analytical report also has environmental analytical results for CWI's North and South Seepage Ponds. These ponds are Illinois EPA-regulated seepage ponds for CWI's rinse waters from the annealing process, non-contact cooling water, boiler blowdown and storm water.

- 3 **Upcoming Events/Activities Planned** – CWI will continue to operate the existing remediation systems. Effluent samples will be collected, analyzed and reported as required in our NPDES permit. CWI has reapplied for the NPDES permit for this system adding a second discharge for the pump and discharge system and awaits comments from IEPA.

CWI has submitted a water well permit application to the McHenry County Health Department for the replacement irrigation well for Ex. 6 Personal Privacy (PP) received a comment letter from the county and has responded to the comments.

CWI plans to meet as needed with Ex. 6 Personal Privacy (PP) work out details and schedules, but that work won't kick off until the McHenry County water well permit is issued.

Samples will continue to be collected at the Ex. 6 Personal Privacy (PP) every month when the irrigation pumps are not operating, usually between November and March of each year.

- 4 **Anticipated Problem Areas and Recommended Solutions** – None.
- 5 **Key Personnel Changes** – None.
- 6 **Target and Actual Completion Dates** – This project has not deviated from the project schedule.